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DEC 16 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	CC Docket No. 98-170
Truth-in-Billing and	)	
Billing Format	)	

AT&T Reply

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December 16, 1998

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Summary

The comments show that the operation of market forces, combined with effective enforcement, is the best way to address most of the problems cited in the NPRM. Reputable carriers and consumers should not be forced to implement or pay for expensive billing system changes because of the questionable practices of a small number of bad actors.

There is also no need for the Commission to promulgate detailed rules to address the matters that are within its jurisdiction, because Section 201(b) gives it the power to prosecute violators. There is, however, a legitimate need to promote national uniformity in billing practices. Given the jurisdictional and other legal issues associated with the broader issues relating to billing matters, the Commission can best serve this purpose by establishing a broad-based forum in which all interested parties can work cooperatively to develop voluntary guidelines.

To the extent that the Commission deems it appropriate to adopt any new rules, it must consider the costs necessary to implement them. It should also assure that any new rules are flexible enough to accommodate the requirements of carriers' multiple and complex billing systems, as well as the needs of individual customers. Moreover, the Commission should not adopt any new rules unless the consumer benefits

outweigh the substantial costs required to modify carriers' billing systems.

The record indicates that the problems identified in the NPRM are associated almost exclusively with residential customers' bills for wireline services. Therefore, the application of any new rules should be limited to those types of bills. In particular, the Commission should not adopt new rules that apply to bills for business customers or CMRS subscribers. In addition, any new rules should not foreclose customers' ability to take advantage of new or optional billing capabilities.

Finally, the record indicates that some of the problems identified in the NPRM could be ameliorated if customers were provided a few key facts in their billing statements.

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AT&T Reply

Pursuant to the Commission's Notice of Proposed Rulemaking, FCC 98-232, released September 17, 1998 ("NPRM"), AT&T Corp. ("AT&T") hereby replies to the comments submitted on November 13, 1998.[1]

Introduction

The comments support the positions advanced in AT&T's comments. First, there is no dispute that consumers should have reasonable access to truthful and non-misleading information about the services listed on their bills. The comments show, however, that existing market forces already provide reputable carriers with powerful incentives to provide their customers with such information.

[1] A list of commenters and the abbreviations used to refer to each is appended as Attachment A. A number of commenters raised issues in their comments that are being addressed in other proceedings. AT&T will generally not address those maters below. However, AT&T points out that the APCC's statements (pp. 2-7) regarding IXCs' alleged "multiple recovery" of payphone compensation costs have been thoroughly discredited. See ex parte letter from Robert H. Castellano, AT&T, to Magalie Roman Salas, FCC, CC Docket No. 96-128, dated June 17, 1998.

Second, the comments demonstrate that there is little need for additional billing rules regarding interstate telecommunications services, because Section 201(b) of the Communications Act provides the Commission with authority to address the billing matters that are within its jurisdiction. Thus, what is needed is effective enforcement, not additional rules. The comments also show that the best way to develop uniform billing practices for all services that are included in telecommunications bills is to convene a forum in which all interested parties can work together cooperatively to create national guidelines.

Third, the comments of billing services providers demonstrate that it is time-consuming and costly to make changes to established billing systems, and that consumers are demanding shorter, rather than longer, billing statements. Thus, the Commission should make a careful cost/benefit analysis to assure that the consumer benefits of any rule change outweigh the additional systems costs, which will ultimately be borne by those same consumers. Moreover, to the extent the Commission deems it necessary to make any rule changes, it is important that such rules give billers and carriers substantial flexibility, so they can accommodate the needs of their systems and their customers.

Fourth, the comments show that any new rules need only apply to residential consumers' bills for wireline services.

In particular, there is no need for additional rules that would apply to billing for large business customers and CMRS subscribers. Moreover, no rules should supersede explicit billing arrangements that have been agreed to between carriers and their customers.

Finally, there are a few minimal information requirements that the Commission could establish so that consumers have key information about their accounts. Information about PICs, however, cannot be accurately provided until all carriers, including resellers, are required to obtain and use unique carrier identification codes ("CICs").

I. Market Forces Already Provide Carriers With Strong Incentives To Provide Consumers With Truthful And Non-Misleading Information.

There is no dispute that consumers are entitled to receive truthful and non-misleading information about the services they buy, so they can make informed purchasing decisions and verify that those decisions have been properly implemented by their chosen vendors.[2] However, the comments demonstrate that reputable carriers, both large and small, recognize this fact and treat billing as a competitive tool

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[2] See, e.g., AT&T, p. 1; FTC, p. 1.

to attract and please their customers.[3] Thus, they go to significant lengths to learn about their customers' billing needs and provide them with all pertinent information. For example, several carriers describe the modifications they have voluntarily made, or are making, to their billing systems.[4]

Even more important, carriers' billing modifications have been made in response to direct input from their customers regarding consumer preferences and needs.[5] AT&T also constantly conducts consumer research to assure that its billing services keep pace with consumers' requirements.[6] Given that so many carriers are actively involved in this type of market-focused activity, there would appear to be at most a limited need to adopt additional rules in this area.[7]

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[3] E.g., ALTS, p. 5; SBC, p. 25; Sprint, p. 4; TRA, p. 3-4 ("market forces are powerful drivers"); USTA, pp. 1-2; U S WEST, pp. 3, 17-18.

[4] See, e.g., Ameritech, p. 2; Bell Atlantic, Attachment, p. 2; BellSouth, n.8; GTE, pp. 5-6; U S WEST, p. 7.

[5] E.g., Ameritech, p. 2; Bell Atlantic, Attachment, p. 5; GTE, pp. 5-6; Sprint, p. 4; U S WEST, p. 7.

[6] See AT&T, pp. 3-4. See also MCI, pp. i, 2.

[7] E.g., GTE, p. 9; CompTel, p. 1 (Commission should in the first instance rely on market forces); MCI, p. 20 ("[c]ompetition, not regulation, is the best answer"); Teligent, p. 2.

II. The Commission Already Has Authority To Address Billing Issues That Are Within Its Jurisdiction; Thus Its Primary Focus Should Be On Encouraging The Development Of National Guidelines To Encourage Uniformity In Billing Practices.

Section 201(b) provides the Commission with ample authority to prosecute the small number of entities that engage in unjust or unreasonable billing practices relating to services that are subject to the Commission's jurisdiction.[8] Thus, there is no need to adopt rules that micromanage how interstate telecommunications carriers bill their customers.[9] As Ameritech correctly states (p. 1), "[t]o the extent a few carriers insist on issuing untruthful or misleading bills, enforcement is the appropriate remedy."[10]

In addition, a number of commenters, including several States, note that the Commission's jurisdiction in this area only relates to the billing of interstate telecommunications

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[8] See, e.g., AT&T, pp. 6-8; ACTA, p. 2 ("deceptive billing practices are already illegal at both the federal and state levels"); MCI, n.15; Nextel, pp. 11-12; Sprint, p. 23; TW Telecom, p. 12.

[9] E.g., ACTA, p. 2; Ameritech, p. 5; USTA, p. 4.

[10] See also AT&T, p. 2; MCI, pp. 4-5; Qwest, p. 6; Bell Atlantic, p. 2 (Commission should not "try to get at [] bad actors [who commit fraud] by creating a brand new system of rules and regulations for telephone company bills"); BellSouth, p. 2; SBC, p. 12; TW Telecom, pp. 2-3; U S WEST, p. 4.

services.[11] Thus, the Commission could not, on its own, adopt rules that would address all the issues that may arise from the questionable practices of unscrupulous vendors, especially problems relating to intrastate services and non-telecommunications services.[12]

Accordingly, many commenters agree with AT&T (pp. 10-12) that the Commission can best serve the public interest by working cooperatively with all interested parties to develop national guidelines, rather than rules, to address the problems identified in the NPRM. For example, the New York PSC (pp. 1-2) suggests that "it could be productive for the Commission to convene a working group that includes consumer groups, carriers, state regulatory commissions and other interested parties to establish billing formats."[13]

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[11] E.g., Ohio PUC, p. 4 ("the Ohio Commission has jurisdiction over its telecommunications intrastate matters"); Minnesota OAG, pp. 3-4 (FCC does not have primary jurisdiction over LECs' billing and collection practices, because "billing and collection is still a regulated local service in many states" (emphasis in original)); PaPUC, pp. 3; 4-6 (same). See also AT&T, n.8; Ameritech, p. 4; ALTS, n.2; Bell Atlantic, Attachment, pp. 2-3; TW Telecom, pp. 5-7.

[12] BellSouth, p. 3 (Commission's jurisdiction is circumscribed by the fact that telephone bills are used as a billing vehicle by numerous parties whose activities are not subject to regulation under the Communications Act). See FTC, pp. 5-6 (describing FTC actions against cramming of non-telecommunications services).

[13] In this regard, however, Bell Atlantic correctly states that "there is no perfect way -- or a single correct way -- to organize a telephone bill." Bell Atlantic, Attachment,

(footnote continued on next page)

Moreover, the Commission and other regulators have no experience in bill design.[14] Thus, cooperative input from all interested parties, especially carriers who constantly interact with consumers to determine their needs, is vital to the development of reasonable billing guidelines.[15] A broad-based forum provides a better setting than a rulemaking to establish such guidelines.[16] As AT&T (pp. 12-13) noted, such a national forum could also be helpful in developing consensus on ways to describe charges relating to support for the Federal Universal Service Fund and access cost contributions.[17]

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p. 4. See also AT&T, pp. 9-10 ("there is always more than one way to express and present the information that consumers require . . . [and] none is so inherently superior that it should be mandated in a rule"); Qwest, p. 4; TW Telecom, pp. 9-11; USTA, p. 2.

[14] Bell Atlantic, p. 4; SBC, p. 9 (individual carriers are in the best position to determine customers needs "based upon the feedback they receive from their customers").

[15] See AT&T, p. 4.

[16] See U S WEST, pp. 12-13 ("[c]onvening an industry work group . . . would be calculated to produce greater consensus in a shorter period of time" than a rulemaking); NASUCA, p. 6.

[17] See also NYDPS, p. 2; National Consumers League, p. 8 (developing standard terms "should be a collaborative process in which companies, regulators and consumer advocates all participate")"

In addition, many commenters recognize the complexity of these issues and recommend that "guidelines, rather than regulations, are the appropriate remedy [that] would be consistent with the Commission's continuing emphasis on deregulation and market responsibility."[18] The NYCPB (pp. 6-7) also notes that such a process would help the Commission to achieve its stated purpose to initiate a dialogue with the states on these issues.[19] The NYCPB also recognizes that such guidelines would be more flexible than rules, and that the creation of guidelines would "avoid any disputes" regarding the Commission's authority to adopt broadly applicable rules.[20]

[18] New York State Consumer Protection Board ("NYCPB"), p. 6. See also, e.g., CenturyTel, p. 1; Coalition to Ensure Responsible Billing, p. 13; Commonwealth, p. 1; CompTel, p. 6; GTC, p. 3 ("[d]irect regulation of bill content will embroil the Commission in a no-win contest"); GTE, p. 9; MCI, pp. ii; Missouri PSC, p. 2; PCIA, p. 3; Project Mutual, p. 2; Qwest, p. 3; Sprint, p. 5; TRA, p. 3; USTA, p. 3 (Commission should "opt for principles over prescriptions"); U S WEST, pp. 5, 13-16.

[19] See also BellSouth, pp. i, 3 (urging the Commission to work closely with the States to develop guidelines and to develop a forum to address billing issues on a national level; otherwise multi-state providers can face inconsistent requirements that add significantly to the costs and complexity of the billing function); Florida PSC (FCC "provides a useful forum for discussing issues that impact all states"); Frontier, pp. 8-9; Teligent, pp. 9-10; USTA, p. 3; U S WEST, p. 12.

[20] See also Florida PSC, p. 4 (recommending that "the FCC not adopt mandatory rules which must be followed in each state, but instead serve as a national forum for addressing these issues"); Missouri PSC, p. 2; AT&T, p. 11; Ameritech,

(footnote continued on next page)

In addition, ALTS agrees with AT&T (pp. 7, 9-10) that billing provides new entrants with a means to offer competitively significant differences from the capabilities offered by incumbent LECs.[21] Thus, ALTS (p. 5) also opposes the adoption of extensive new billing rules and correctly notes that such rules "would tend to mandate mediocrity in billing rather than superior billing practices."

III. Any New Rules Must Recognize The Costs And Technical Difficulties Required To Change Existing Billing Systems.

The NPRM (¶ 11) properly stated concerns about the costs associated with the adoption of any new billing rules. This is appropriate, because all additional costs resulting from such rules would have to be passed on to customers.[22] The comments of several carriers that provide billing services demonstrate that billing system changes are neither simple nor cheap and that such changes take significant time to implement. At the same time, carriers that use LEC billing services note that existing systems are inflexible

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p. 5 (supporting use of "guidelines"); Project Mutual Telephone Cooperative, p. 2. And see ACTA, p. 7 (Commission should allow self-regulation through the adoption of a voluntary code of conduct); Coalition to Ensure Responsible Billing, p. 12 (same).

21 See also Sprint, p. 4; Bell Atlantic, p. 4.

22 See MCI, p. 4.

and limit their ability to provide extensive additional data on bills.[23] Furthermore, carriers' consumer research indicates that consumers want accurate but shorter bills. All of these factors should be carefully considered before the Commission adopts any rule that would require carriers to make significant changes to their billing systems.[24]

Carriers' billing systems are large, complex and expensive to modify. Accordingly, Ameritech (p. 3) urges the Commission to "recognize the wide range of system capabilities that are inherent in different billing systems, and . . . not impose rigid or overly detailed requirements that may needlessly impose hardships on certain carriers and their customers."[25]

Ameritech (id.) specifically notes that its own recent multi-million dollar billing system modifications could only be completed within eighteen months because they were "intentionally limited to format changes that entailed no software or hardware changes to billing or underlying legacy systems." It also stresses that the $8 million cost of implementing its new billing format "pales when compared to

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[23] E.g., Qwest, pp. 5, 6.

[24] E.g., CompTel, p. 1; Sprint, pp. 2-3.

[25] See also BellSouth, p. 6; Commonwealth, p. 3; U S WEST, pp. 20-21; GST, p. 13 ("mandating a uniform bill format that all carriers could economically use would be nearly impossible").

the costs that would have to be incurred" if there had been any such changes.[26] Thus, for example, Ameritech (pp. 11-12) cannot even estimate the costs that would be necessary to identify all the changes that may appear on a customer's bill from month to month just for its own services, much less for the services it bills on behalf of others. Moreover, Ameritech (pp. 18-19) adds that any billing system modifications in 1999 and early 2000 would have to be limited in order to assure that it can comply with Year 2000 demands.

Other LECs concur. For example, Bell Atlantic (p. 4) states that "[t]he process of design, testing and implementation [of a new bill] is not a fast one, and it takes a company like Bell Atlantic several years to complete it, and . . . it is an extremely costly process." Similarly, BellSouth (p. 4) states that extensive software changes would be needed in order to develop a summary page that could appear on each monthly bill.[27] In addition, Bell Atlantic (Attachment, p. 7) points out that the industry "is constrained by the existing billing record exchange standard, which limits the length of a service description."

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[26] See also TW Telecom, p. 4 (adoption of NPRM's proposals could increase its billing costs by 10-60%).

[27] See also GTE, p. 11.

This, in turn, limits a carrier's ability to provide lengthy service descriptions on telephone bills.[28]

In addition, all of the consumer research referenced in the comments repeatedly indicates that consumers want their bills to be concise.[29] This militates against rules that would require lengthy explanations of a vendor's services. It also clearly indicates that consumers would be disinterested in frequent recitations on their bills about the complex history of the Commission's policies implementing universal service and access subsidies. As CenturyTel (p. 8) states, to explain the intricacies of those policies "to the average consumer in a short, concise statement [would be] a Herculean task." At best, customers would be terribly confused by descriptions of these policies on their bills,[30] which would likely spur even more

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[28] See also Coalition to Ensure Responsible Billing, pp. 18-19. Moreover, Ameritech (p. 11) also points out that there are more effective and efficient ways that carriers can provide customers with information about their service arrangements, such as periodic bill inserts or direct mailings. See also AT&T, pp. 8-9; SBC, p. 24; Sprint, pp. 3, 13. All of these mechanisms are likely to be less expensive than requiring wholesale modifications to complex billing systems.

[29] E.g., Bell Atlantic, Attachment, p. 5 ("our customers have consistently told us . . . that our bills have too many pages"); BellSouth, p. 4 (customers want "shorter and simpler bill[s]"); SBC, pp. 12, 21; Sprint, pp. 4, 12. See also AirTouch, p. 5; ALTS, p. 4.

[30] See e.g., AT&T, n.9; BellSouth, p. 16; CPUC, p. 8; CenturyTel, p. 9; Qwest, p. 3; SBC, p. 18; Sprint, p. 17.

inquiries, both to carriers and regulators. Thus, even apart from the serious First Amendment implications of such a requirement,[31] the costs of such a rule could not reasonably outweigh any benefits.

IV. Any New Billing Rules Should Apply Only To Bills Issued To Residential Consumers For Interstate Wireline Services.

Just as the costs of any new rule should not exceed their benefits, the scope of such rules should not exceed their demonstrated need. The comments make it clear that the problems referenced in the NPRM relate overwhelmingly to residential consumers' bills for wireline services.[32] Therefore, to the extent that the Commission deems it appropriate to issue any rules in this proceeding, they should apply only in those situations.[33]

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[31] See, e.g., AT&T, n.9; CTIA, pp. 9-11; BellSouth, p. 3; PCIA, p. 14; PrimeCo, pp. 13-14.

[32] Ameritech, p. 6; C&W USA, p. 2.

[33] It should also be noted that some of the NPRM's proposals can apply only to LECs because they require access to information that only LECs will possess, such as the identity of a customer's PIC and the applicability of a "PIC freeze" or similar option to a particular consumer's account (see AT&T, p. 6; Qwest, p. 5). In addition, the Commission should take this opportunity to declare that the nondiscrimination safeguards of Section 272(c) require that BOCs offer billing services for CLECs that are equivalent to the services they provide to their Section 272 affiliates (see Electronic Commerce Association, pp. 4-6; Coalition to Ensure Responsible Billing, pp. 3-6).

Many commenters agree with AT&T (pp. 4-5) that there is no need for billing rules applicable to business customers.[34] Not only are business customers more sophisticated than residential consumers, but their billing requirements are significantly different, and often unique.[35] The Commission should not adopt any new regulatory rules that would inhibit carriers' ability to satisfy those customers' billing needs at the lowest possible cost.

Similarly, the comments of CMRS providers provide convincing evidence that there is no need to graft onto wireless services additional regulatory requirements that are based on the experience of wireline customers.[36] Not only do CMRS providers offer service under different and more market-based regulatory rules,[37] but incidents of slamming and cramming are also substantially lower for CMRS customers, in part because CMRS providers' bills typically

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[34] See GST, pp. i-ii, 16-20; PetroCom, p. 3; Sprint, n.2; TRA, p. 4-5.

[35] Teligent, pp. 3-4.

[36] E.g., Bell Atlantic Mobile, p. 10; Omnipoint, p. 2.

[37] See e.g., Bell Atlantic Mobile, pp. 2-7; BellSouth, pp. 11-12; PrimeCo, p. 15.

do not include charges for non-telecommunications services.[38]

In addition, any new regulatory rules adopted here should not force carriers to abandon other consensual arrangements that provide customers with other benefits. For example, carriers should continue to be able to develop and offer new billing options such as electronic billing.[39] Carriers should also be able to provide service options such as lower prices and/or added features or functionality in return for more streamlined billing.[40]

V. It Is Reasonable To Require That Consumers Receive Certain Specific Information on Their Bills.

AT&T's comments support the adoption of rules that would assure consumers receive access to two limited, but key, pieces of information about their telecommunications services. There is general support among the commenters for these requirements.[41]

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[38] See e.g., AirTouch, p. 6; Ameritech, p. 6; Bell Atlantic Mobile, pp. 7-10; BellSouth, p. 11; Nextel, pp. 7-9; PCIA, pp. 5-8; PrimeCo, p. 5. For similar reasons, CompTel (p. 3) reasonably suggests that no new rules are necessary for bills that are issued directly to consumers by non-dominant carriers. See also Sprint, p. 9.

[39] Teligent, pp. 4-7.

[40] AT&T, p. 4.

[41] In contrast, a number of commenters oppose a federal requirement relating to identification of "deniable" versus "non-deniable" charges, for reasons ranging from technical

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First, there is no disagreement that consumers' bills should include the names of the carriers that provide their interstate telecommunications services, including resellers.[42] This is basic information that consumers need to assure that they are only receiving bills from carriers they have chosen to do business with. In this regard, Americatel (p. 2) raises a significant point of clarification. If a carrier provides service under a lawful trade name, that is the name that should be provided on the bill. Otherwise, consumers would likely be unable to recognize the service provider's name, leading to additional confusion.[43]

Second, the commenters generally agree with AT&T (pp. 14-15) that all carriers should be required to provide a toll-free customer service number on each bill, so that consumers may reach them if they have a question or

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difficulty, to customer confusion regarding the terms used, to concerns about significantly increased uncollectibles for legitimate service providers (see e.g., ALTS, pp. 9-10; CenturyTel, p. 6; CompTel, p. 7). Thus, the Commission should follow the suggestion of AT&T (n.8) and others (Ameritech, pp. 15-16; Bell Atlantic, Attachment, p. 9: GST, p. ii) and rely on the States to address such issues, which, in all events, involve principally intrastate matters.

[42] E.g., AT&T, p. 14; Ameritech, p. 17; BellSouth, p. 7; CenturyTel, p. 6; Commonwealth, p. 4; FTC, p. 14; Kansas Corporation Commission, p. 5; Ohio PUC, p. 6; Sprint, p. 13.

[43] See also Maine PUC, p. 6.

concern.[44] This uncontroversial requirement is already used by many carriers and will help consumers to resolve problems directly.

AT&T (pp. 5-6) also recognizes that it may be helpful to have LEC bills identify consumers' interLATA PIC each month. However, the commenters agree that such information cannot be accurately provided unless all carriers, including resellers, are able to obtain, and required to use, individual CIC codes.[45] AT&T supports efforts to implement such a requirement.[46]

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[44] See, e.g., Ameritech, p. 16; BellSouth, p. 9; Commonwealth, p. 5; FTC, p. 14; NAAG, p. 5; Ohio PUC, p. 11.

[45] E.g., Ameritech, pp. 9-10, BellSouth, pp. 7-8; SBC, p. 25; Sprint, n.6; U S WEST, n.12.

[46] AT&T (p. 6) also believes that it would be useful to consumers to have LEC bills inform customers whether they have an active "PIC freeze" or similar restriction on their account. See also FTC, p. 10.

Conclusion

For the reasons stated above and in AT&T's Comments, there is no need to adopt extensive rules in this area. To the extent that the Commission deems it necessary to adopt any new rules, such rules should be consistent with AT&T's comments in this proceeding.

Respectfully submitted,

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December 16, 1998

CC 98-170 Truth-in-Billing Commenters

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American Federation of Teachers ("AFT")
American Public Communications Council ("APCC")
Americatel Corporation
Ameritech
Association for Local Telecommunications Services ("ALTS")
AT&T
Bell Atlantic
Bell Atlantic Mobile, Inc.
Billing Reform Task Force
BellSouth Corporation ("BellSouth")
Bills Project Division of the Foundation for Taxpayer and Consumer Rights
Cable & Wireless USA, Inc. ("C&W USA")
California Public Utilities Commission & People of the State of California ("CPUC")
Cellular Telecommunications Industry Association ("CTIA")
CenturyTel
Coalition to Ensure Responsible Billing
Commonwealth Telephone Company ("Commonwealth")
CommNet Cellular Inc.
Competitive Telecommunications Association ("CompTel")
Education and Library Networks Coalition
Electronic Commerce Association
Excel Telecommunications, Inc.
Federal Trade Commission ("FTC")
Florida Public Service Commission ("Florida PSC")
Frontier Corporation ("Frontier")
Georgia Consumers' Utility Counsel Division
Global Telecompetition Consultants, Inc. ("GTC")
GST Telecom Inc.
GTE
GVNW, Inc./Management
Independent Telephone & Telecommunications Alliance
Kansas Corporation Commission
Liberty Cellular, Inc.
Maine Public Utilities Commission ("Maine PUC")
MCI WorldCom, Inc. ("MCI")
MediaOne Group, Inc.
Minnesota Office of Attorney General ("Minnesota OAG")
Mississippi Public Service Commission
Missouri Public Service Commission ("Missouri PSC")
National Association of Attorneys General ("NAAG")
National Association of Consumer Agency Administrators
National Association of State Utility Consumer Advocates ("NASUCA")
National Consumers League

Nevadacom, Inc.
New Networks Institute ("NNI")
New York State Consumer Protection Board ("NYCPB")
New York State Department of Public Service ("NYDPS")
Nextel Communications, Inc. ("Nextel")
Northwestern Indiana Telephone Company, Inc. ("NITCO")
Ohio Public Utilities Commission ("Ohio PUC")
Omnipoint Communications, Inc. ("Omnipoint")
Pennsylvania Public Utility Commission ("PaPUC")
Personal Communications Industry Association ("PCIA")
Petroleum Communications, Inc. ("PetroCom")
Pilgrim Telephone, Inc.
PrimeCo Personal Communications, L.P. ("PrimeCo")
Project Mutual Telephone Cooperative Association ("Project Mutual")
Quality Communications Inc. ("QCI")
Qwest Communications Corporation ("Qwest")
Rural Cellular Association
Rural Telecommunications Group
Rural Telephone Coalition
SBC Communications Inc. ("SBC")
Siegel and Gale
Small Business Alliance for Fair Utility Regulation ("Small Business")
Southern Communications Services, Inc.
Sprint Corporation
Telecommunications Resellers Association ("TRA")
Teligent, Inc.
Texas Citizen Action ("TCA")
Public Utility Commission of Texas ("PUCT")
Texas Office of Public Utility Counsel ("OPC")
Time Warner Telecom, Inc. ("TW Telecom")
United States Cellular Corporation ("USCC")
USP&C, Inc.
United States Telephone Association ("USTA")
U S West Communications, Inc. ("U S WEST")
Utility Consumers' Action Network ("UCAN")
Vermont Public Service Board and Vermont Department of Public Service ("Vermont")
Washington Utilities & Transportation Commission Staff ("WUTC Staff")
West Virginia Public Service Commission Consumer Advocate Division ("WVCAD")
West Virginia Public Service Commission ("WVPSC")
Wisconsin Public Service Commission ("PSCW")

CERTIFICATE OF SERVICE

I, Rena Martens, do hereby certify that on this 16th day of December, 1998, a copy of the foregoing "AT&T Reply" was served by U.S. first class mail, postage prepaid, to the parties named on the attached service list.

Rena Martens

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